



OFFICE OF THE STATE FIRE MARSHAL

**2008 SPRING
PIPELINE SAFETY CONFERENCE**

SFM ISSUES

- CHANGING STATUS OF PIPELINES
 - ACTIVE TO OUT OF SERVICE
 - ACTIVE TO ABANDONED
 - OUT OF SERVICE TO ABANDONED
 - OUT OF SERVICE TO ACTIVE

SFM ISSUES

- WAIVER LETTERS
 - ILI Waiver in lieu of hydrotest
 - Time extensions
 - Testing in Product

SFM ISSUES

- Accident reporting
- Annual reporting requirements
- Integrity Management update
- Public Awareness update
- Standard Inspections
 - Drug and Alcohol Program review
- Gathering/Low Stress lines

Definitions

- Active Line – A pipeline that is in service. Includes lines that are not formally approved as Out of Service or Abandoned. Must comply with all state and federal requirements.

Definitions

- Out of Service – a pipeline that has been cleaned of all liquids, filled with water or inert gas and blinded from active system. Must still be reported to SFM on annual questionnaire – but not subject to annual fees. **SFM does not have category of “idle”**

Definitions

- Abandoned – Must have met the criteria of an out of service line but will not be maintained to minimum standards. Line cannot ever be returned to active hazardous liquid. Does not have to be reported on annual questionnaire – but SFM will maintain data on the line.

Active to Out of Service

- Requirements
 - Letter to our office must include the following:
 - Date of request
 - Subject Line must state what the request is for and must include our CSFM Line ID# and description of the pipeline
 - Written plan must be submitted for approval
 - Est time when project will start
 - Contact name and phone number

Active to Out of Service

- Return letter to operator will include the following
 - Written approval of plan
 - Request to contact our office prior to starting work
 - Statement that line will be reclassified as out of service in our DB – no fees
 - Contact name and number for any questions

Active or OOS to Abandoned

- Requirements
 - Letter to our office must include the following:
 - Date of Request
 - Subject line must state what the request is for and must include our CSFM Line ID# and description of the pipeline
 - Written plan must be submitted for approval
 - Est time when project will start
 - Contact name and phone number

Active or OOS to Abandoned

- Return letter to operator will include the following
 - Written approval of plan
 - Request to contact our office prior to starting work
 - Statement that line will not be subject to annual fees and will be reclassified as abandoned
 - Contact for any questions

Out of Service to Active

- Line must have previously been approved to take out of service
- Written plan must be submitted and approved by CSFM
- Inspection of records will be made to ensure that line has been in compliance while out of service
- Line will be subject to annual fees again

Out of Service to Active

- Letter to our office must include the following:
 - Date of request
 - Subject line must state what request is for and must include our CSFM Line ID# and description of the pipeline
 - Written plan must be submitted for approval
 - Est time when project will start
 - Contact name and phone number

ILI Waivers

- CA regulations only allow hydrostatic testing – so waiver is required to run ILI tool
 - Waiver letter to SFM must include the following:
 - Date of request
 - Subject line must state what waiver is for
 - CSFM Line ID# and description must be included
 - Contact name and phone number

ILI Waivers

- Waiver letter to SFM must also include:
 - Anticipated date of tool run
 - Type of tool that will be run
 - Caliper tool
 - Axial flaw detection high resolution

RETURN LETTER

- ID # will be assigned to ILI run
- Conditions
 - Inspection summaries to be supplied in timely manner
 - Any anomalies identified as Safety Related Condition or Immediate Repair shall be promptly reported and repaired
 - Safety related condition report and repair shall be submitted to our office.

TIME EXTENSIONS

- SFM automatically gives 90 day extension to due date. Call our office first.
- Extensions beyond 90 days requires written approval.
- IMP extensions – 5 years plus 8 months allowed.

TESTING IN PRODUCT

- CA allows testing with product
 - Requires written approval
 - Must submit testing procedure
 - Flashpoint must be above 140° F.
 - Fire department notification 3 days prior
 - Patrol of PL during test
 - Equipment on standby in event of release
 - IMP hydro requires PHMSA approval

ACCIDENT REPORTING

- CFR Part 195.50 has requirements listed.
 - Explosion or fire
 - 5 gallons or more
 - Death of person
 - Personal injury with hospitalization
 - More than \$50,000 in property damage, clean up, recovery, value of lost product.

ACCIDENT REPORTING

- Telephonic notification required to CA OES and PHMSA.
- PHMSA 7000-1 Form required within 30 days – Copy to SFM
 - Instructions are on line at PHMSA website
 - Must report what was released – release into containment area is reportable
 - Supplemental or final report if needed must be submitted

ACCIDENT REPORTING

- Latitude and longitude must be reported
- Costs must include
 - Cost of clean up
 - Cost of recovery
 - Value of lost product
 - Damage costs to property of operator
 - Damage costs to property of others

ANNUAL REPORT

- CFR Part 195.49 requires submittal of PHMSA Form 7000-1.1
- Information is for previous calendar year
- Submittals must be done by June 15
- A number of operators have not been submitting.

INTEGRITY MANAGEMENT

- Focus of SFM inspections for 2nd half of year.
- Small operators (less than 500 miles)
- 13 small operators left to do.
- Baseline assessments to be 100% completed by Feb 2009
- New small operator PHMSA form

PUBLIC AWARENESS

- SFM focus on 2nd half of year will focus on those operators who did not submit program to PHMSA clearinghouse
- API RP 1162 is reference to use
- 52 questions that need to be answered in the program
- This is **not** damage prevention regulation

DRUG AND ALCOHOL

- SFM Standard Inspections this year and next year will include a review of operators drug and alcohol program
- CFR Part 199
 - Subpart B Drug testing
 - Subpart C Alcohol Prevention program
- PHMSA Field Inspection Forms 3.1.9 and 3.1.10 to be used

RURAL GATHERING

- Extending regulations to onshore rural gathering within USA's. Regulated rural gathering line.
- Gathering line definition to stay the same
 - Has to come from a production facility
- New section of rule – 195.11(a)
“Regulated rural gathering line”

RURAL GATHERING

- **NEW** Part 195.11 (a)
 - Nominal diameter between 6 5/8" and 8 5/8"
 - Operates at MOP that corresponds to stress level greater than 20% of SYMS. About 125 psig.
 - Located in or within 1/4 mile of USA

RURAL GATHERING

- **NEW** Part 195.11 (b)
 - Need to comply with reporting requirements of subpart B
 - Establish MOP under 195.406
 - Establish public awareness program -195.440
 - Corrosion requirements of Subpart H to include cleaning, monitoring, remediating
 - Apply OQ program

RURAL GATHERING

- NEW Part 195.11 (c)
 - USA's
 - Operators should annually review NPMS for new USA's
 - 6 months to one year for compliance
- NEW Part 195.11 (d)
 - Records retention
 - Life or according to requirements of sections

COMPLIANCE DEADLINES

- Vary according to safety requirements
 - Identification of lines – 6 -12 months
 - MOP – 12 – 18 months
 - Line markers – 12-18 months
 - Public education – 12 – 18 months
 - OQ – 1 – 2 years
 - IMP Program – 1 – 2 years
 - etc

LOW STRESS LINES

- **NEW** Part 195.12 (a)
 - Regulated low stress line – onshore line in a rural area meeting the following:
 - Nominal diameter of 8 5/8" or more
 - Located within 1/2 mile of USA – (was 1/4 mile)
 - Operates at MOP that corresponds to stress level equal to or less than 20% of SMYS (<125 psig)

LOW STRESS LINES

- **NEW** Part 195.12 (b)
 - Identify all segments meeting criteria within 6-12 months of final rule
 - Comply with reporting requirements of subpart B within 6-12 months of final rule
 - Establish MOP under 195.406
 - Establish and apply an IMP 195.452 (c) baseline assessment no later than 60 months after final rule (50% by 30-48 months)

LOW STRESS LINES

- Part 195.12 (b) –continued
 - Comply with all other safety requirements of Part 195 (except Subpart H) before 12-24 months following rule
 - Comply with Subpart H (Corrosion) within 24 - 36 months of final rule

LOW STRESS LINES

- **NEW** Part 195.12 (c)
 - Economic compliance burden
 - Notify PHMSA if line meets criteria, carries crude oil from production facility, operates at flow rate <14,000 bbl per day
 - Operator determines that it would be a burden to implement 195.452 (d) baseline assessments or (j) continual process to evaluate and maintain integrity
 - PHMSA will stay implementation until analysis is done

LOW STRESS LINES

- **NEW** Part 195.12 (d)
 - New USA's
 - If operator, after effective date of final rule, identifies new USA's and a new pipeline operator must
 - Implement requirements of Part 195 within 6-12 months
 - Establish IMP
 - Complete baseline assessment .

STATUS

- Status of new rules –
 - Unknown
 - Waiting for the final rules to be published (expected by 2007)
 - Don't know what or how final rule will change the NPRM

CONTACTS

- Cal Fire – www.fire.ca.gov
- SFM – <http://osfm.fire.ca.gov>
- Pipeline – <http://osfm.fire.ca.gov/pipelinehome.html>
- PHMSA – <http://www.phmsa.dot.gov>